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Attorneys for Defendants

Addus Healthcare, Inc. and

Addus HomeCare Corporation

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

MARY MOORE, ALEXANDRIA  
ENCINIAS, individually, and on  
behalf of other members of the  
general public similarly situated;

Plaintiffs,

vs.

ADDUS HEALTHCARE, INC., an  
unknown business entity; ADDUS  
HOMECARE, INC., an unknown  
business entity; and DOES 2 through  
100, inclusive,

Defendants.

Case No. 4:19-CV-01519-HSG

[Assigned to Hon. Haywood S. Gilliam, Jr.]

**CLASS ACTION**

**FURTHER JOINT STIPULATION AND  
ORDER REGARDING BRIEFING  
SCHEDULE ON PLAINTIFFS' MOTION  
TO STRIKE PORTIONS OF  
DEFENDANTS' AMENDED ANSWER**

Date Action Filed:

July 11, 2017

First Am. Complaint Filed:

March 21, 2019

Date Removal Filed:

March 22, 2019

1 **STIPULATION**

2 This stipulation is entered into by and among Plaintiffs Mary Moore and  
3 Alexandria Encinias (collectively, "Plaintiffs") and Defendants Addus Healthcare, Inc.  
4 ("Addus") and Addus HomeCare Corporation ("Addus HomeCare," and erroneously  
5 identified in the First Amended Complaint as "Addus HomeCare, Inc.") (collectively,  
6 "Defendants"), by and through their respective counsel, in light of the following facts:

7 1. WHEREAS, Plaintiffs filed their motion to strike portions of Defendants'  
8 amended answer to Plaintiffs' first amended complaint on May 3, 2019.

9 2. WHEREAS, Plaintiffs' motion to strike is set for hearing on August 29,  
10 2019.

11 3. WHEREAS, the parties previously filed a stipulation on May 17, 2019,  
12 seeking an extension of time to file their respective briefs to provide the parties with an  
13 opportunity to meet and confer regarding Defendants amending their answer to  
14 Plaintiffs' first amended complaint in order to address the concerns raised in Plaintiffs'  
15 motion.

16 4. WHEREAS, on May 20, 2019, the Court approved the stipulation and  
17 extended the deadlines for Defendants' opposition and for Plaintiffs' reply to Plaintiffs'  
18 motion to strike, to May 31, 2019, and June 7, 2019, respectively.

19 5. WHEREAS, the parties now seek an additional extension of time to file  
20 their respective briefs to allow the parties to continue the meet and confer process  
21 regarding Defendants amending their answer in order to resolve the concerns raised in  
22 Plaintiffs' motion.

23 6. WHEREAS, the parties propose a seven (7) day extension of Defendants'  
24 time to file their opposition and for Plaintiffs' to file their reply to Plaintiffs' motion to  
25 strike, to June 7, 2019 and June 14, 2019, respectively.

1           7.     WHEREAS, the requested extension of time for each side to respond does  
2 not impact any other dates in this action, including the August 29, 2019 hearing date for  
3 Plaintiffs' motion.

4           8.     WHEREAS, this stipulation is made for good cause and not for the purpose  
5 of delay.

6           **IT IS SO STIPULATED.**

7  
8     Dated: June 3, 2019

**AKIN GUMP STRAUSS HAUER &  
FELD LLP**  
GREGORY W. KNOPP  
GARY M. MCLAUGHLIN  
VICTOR A. SALCEDO

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11           By /s/ Gary M. McLaughlin  
12                     Gary M. McLaughlin\*\*  
13                     Attorneys for Defendants  
14                     Addus Healthcare, Inc. and  
                      Addus HomeCare Corporation

15     Dated: June 3, 2019

**LAWYERS for JUSTICE, PC**  
Edwin Aiwazian  
Arby Aiwazian  
Tara Zabehi

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18           By /s/ Edwin Aiwazian  
19                     Edwin Aiwazian  
                      Attorneys for Plaintiffs  
                      Mary Moore and Alexandria Encinias

20     \*\*Pursuant to L.R. 5-1(i)(3), I attest that concurrence in the filing of this document  
21 has been obtained from each of the other signatories.

1 **ORDER**

2 **IT IS HEREBY ORDERED**, good cause appearing, that:

3 1. The deadline for Defendants' opposition to Plaintiffs' motion to strike  
4 portions of Defendants' amended answer to Plaintiffs' first amended complaint is hereby  
5 continued seven (7) days and is to be filed by June 7, 2019.

6 2. The deadline for Plaintiffs' reply to Defendants' opposition to Plaintiffs'  
7 motion to strike portions of Defendants' amended answer to Plaintiffs' first amended  
8 complaint is hereby continued seven (7) days and is to be filed by June 14, 2019.  
9

10  
11 Dated: June 3, 2019

  
The Honorable Haywood S. Gilliam, Jr.